

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

ePLUS INC.,)	
)	
Plaintiff,)	Civil Action No. 3:09-CV-620 (REP)
)	
v.)	
)	
LAWSON SOFTWARE, INC.,)	
)	
)	
)	
Defendant.)	

**PLAINTIFF *ePLUS* INC’S OBJECTIONS TO DEFENDANT’S COUNTER
DEPOSITION DESIGNATIONS, COUNTER-COUNTER DESIGNATIONS
AND REVISED SUMMARY OF THE DEPOSITION OF
HENRIK BILLGREN (OCT. 22, 2009)**

Plaintiff, *ePlus*, Inc. (“*ePlus*”), through counsel, hereby submits the following specific objections to Defendant Lawson Software, Inc. (“*Lawson*”)’s Counter-Deposition Designations of the deposition of Henrik Billgren (October 22, 2009) and offers the following counter-counter designations and revised summary:

Specific Objections

Defendant’s Counter Designations	<i>ePlus</i> ’s Objections to Defendant’s Counter Designations	<i>ePlus</i> ’s Counter-Counter Designations
266:7 – 268:2	403 (267:16-268:2)	265:18-22; 266:5
272:17-21		
283:22 – 284:12; 288:17 – 289:16;		289:22-290:15

Defendant's Counter Designations	<i>e</i>Plus's Objections to Defendant's Counter Designations	<i>e</i>Plus's Counter-Counter Designations
290:22 – 291:5		

Revised Summary

Designated testimony relates to:

Mr. Billgren provided a demonstration of the M3 e-Procurement application, both as a supplier and a buyer. 256:12-257:4; 257:22-259:11; 259:19-262:12; 263:7-265:17; 268:5-269:2; 270:7-272:16; 273:19-279:12; 280:2-282:17. Mr. Billgren stated that the demonstration he was directed to do did not describe anything regarding the functionality of the M3 e-Procurement application because it is only playful data that is not representative of an actual customer in any real life situation.¹ (266:7 – 268:2) Mr. Billgren described how a supplier would upload a supplier catalog as an Excel spreadsheet into the system. 257:22-259:11; 259:19-262:12. Mr. Billgren demonstrated the functionality of the M3 e-Procurement application to search by supplier name (*e.g.*, IBM) and by different keywords (*e.g.*, laptop) and through the catalog hierarchy (*e.g.*, hammers) and created and approved a requisition from items selected from the search results. 263:7-265:17; 268:5-269:2; 270:7-272:16; 273:19-279:12; 280:2-281:14.² Mr. Billgren also demonstrated how suppliers could respond to supplier orders with comments, such as whether a particular item is on backorder. 281:15-282:17. For a requisition including two line items to be ordered from two different suppliers, the system created two purchase orders. 280:11-281:14. To the best of Mr. Billgren's knowledge, Lawson has approximately 30 customers that use the M3 e-Procurement application.³ To the best of Mr. Billgren's knowledge, one customer is in the United States, Empire Merchant North. Based on Mr. Billgren's understanding, Lawson's other customers of the e-Procurement application do not use the application in the United States. Some of Lawson's 30 M3 e-Procurement customers use the M3 e-Procurement application as a standalone application and some of them use the M3 e-Procurement application as an add-on integrated with an M3 system.⁴ (283:22 – 284:12; 288:17 – 289:16; 289:22-290:15; 290:22 – 291:5)

¹ Lawson has suggested adding the statement that “Mr. Billgren stated that the demonstration he was directed to do did not describe anything regarding the functionality of the e-Procurement application.” *ePlus* objects to this statement as being incomplete and adds that the witness testified that the demonstration could not be used to describe the functionality of the system only because “playful” data, instead of actual customer data, was loaded into the system.

² Lawson has suggested adding the statement, “Mr. Billgren stated that the demonstration did not indicate whether an item was in stock or not.” *ePlus* objects to this statement as not accurately reflecting the testimony. The witness testified that data in the “delivery time” field of an item description does not provide an indication of whether the supplier for the item has the item in stock.

³ Lawson contends that the witness testified that 30 customers use the e-Procurement application. *ePlus* objects that this was only an approximation and that the witness qualified that his answer was given to the best of his knowledge, and has revised the statement accordingly.

⁴ Lawson suggests adding the following statement: “None of Lawson's 30 e-Procurement customers also use the M3 application as an add-on integrated to the e-Procurement application.” *ePlus* objects to this statement as a mischaracterization of the witness's testimony. The witness stated that of these 30 customers of the e-Procurement application, some of them are standalone and some of them are integrated with M3.

Respectfully submitted,

/s/

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Dated: August 11, 2010

<p>251</p> <p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE EASTERN DISTRICT OF VIRGINIA</p> <p>3 Richmond Division</p> <p>4 -----x</p> <p>5 ePLUS iNC.,)</p> <p>6 Plaintiff,) Civil Action No.</p> <p>7 v.) 3:09-CV-620 (JRS)</p> <p>8 LAWSON SOFTWARE, INC.,)</p> <p>9 Defendant.)</p> <p>10 -----x</p> <p>11 CONFIDENTIAL</p> <p>12 Continued 30(b)(6) Videotaped Deposition of</p> <p>13 Lawson Software, Inc.</p> <p>14 by and through its corporate designee</p> <p>15 HENRIK BILLGREN</p> <p>16 and in his personal capacity</p> <p>17 Washington, D.C.</p> <p>18 Thursday, October 22, 2009</p> <p>19 8:44 a.m.</p> <p>20 Job No.: 1-165765</p> <p>21 Pages: 251 - 295, Volume 2</p> <p>22 Reported By: Lee Bursten</p>	<p>253</p> <p>1 A P P E A R A N C E S</p> <p>2 ON BEHALF OF PLAINTIFF:</p> <p>3 JENNIFER A. ALBERT, ESQUIRE</p> <p>4 Goodwin Procter LLP</p> <p>5 901 New York Avenue, Northwest</p> <p>6 Washington, D.C. 20001</p> <p>7 Telephone: (202) 346-4000</p> <p>8</p> <p>9</p> <p>10</p> <p>11 ON BEHALF OF DEFENDANT:</p> <p>12 WILLIAM D. SCHULTZ, ESQUIRE</p> <p>13 Merchant & Gould PC</p> <p>14 3200 IDS Center</p> <p>15 80 South Eighth Street</p> <p>16 Minneapolis, Minnesota 55402</p> <p>17 Telephone: (612) 332-5300</p> <p>18</p> <p>19</p> <p>20</p> <p>21 ALSO PRESENT:</p> <p>22 ANTONIO TROPEANO, Videographer</p>
<p>252</p> <p>1 Continued 30(b)(6) Videotaped Deposition</p> <p>2 of Lawson Software, Inc. by and through its</p> <p>3 corporate designee HENRIK BILLGREN and in his</p> <p>4 personal capacity, held at the offices of:</p> <p>5 Goodwin Procter LLP</p> <p>6 901 New York Avenue, Northwest</p> <p>7 Washington, D.C. 20001</p> <p>8 (202) 346-4000</p> <p>9</p> <p>10</p> <p>11</p> <p>12 Pursuant to notice, before Lee Bursten,</p> <p>13 Court Reporter and Notary Public in and for the</p> <p>14 District of Columbia, who officiated in</p> <p>15 administering the oath to the witness.</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>	<p>254</p> <p>1 C O N T E N T S</p> <p>2 EXAMINATION OF HENRIK BILLGREN PAGE</p> <p>3 By Ms. Albert 256</p> <p>4 By Mr. Schultz 288</p> <p>5 By Ms. Albert 289</p> <p>6</p> <p>7</p> <p>8 E X H I B I T S</p> <p>9 (Attached to transcript.)</p> <p>10 BILLGREN DEPOSITION EXHIBITS PAGE</p> <p>11 Exhibit 21 United States Patent 286</p> <p>12 Number 6,023,683</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>

<p>255</p> <p>1 PROCEEDINGS</p> <p>2 THE VIDEOGRAPHER: Here begins videotape</p> <p>3 number 1 in the deposition of Henrik Billgren in</p> <p>4 the matter of ePlus inc. versus Lawson Software,</p> <p>5 Inc., in the United States District Court for the</p> <p>6 Eastern District of Virginia, Richmond Division,</p> <p>7 case number 3:09-CV-620 JRS. Today's date is</p> <p>8 October 22nd, 2009. The time on the video monitor</p> <p>9 is 8:44 a.m.</p> <p>10 The video operator today is Antonio</p> <p>11 Tropeano of Merrill LAD. This video deposition is</p> <p>12 taking place at Goodwin Procter, 901 New York</p> <p>13 Avenue, Northwest, Washington, D.C., 20001.</p> <p>14 Counsel, please voice identify yourselves and state</p> <p>15 whom you represent.</p> <p>16 MS. ALBERT: Jennifer Albert with the law</p> <p>17 firm of Goodwin Procter. I represent the</p> <p>18 plaintiff, ePlus incorporated.</p> <p>19 MR. SCHULTZ: William Schultz with</p> <p>20 Merchant & Gould, and I represent Lawson Software,</p> <p>21 Incorporated.</p> <p>22 THE VIDEOGRAPHER: The court reporter</p>	<p>257</p> <p>1 environment in order to demonstrate the</p> <p>2 functionality today?</p> <p>3 A Actually not. This is the live</p> <p>4 demonstration environment that is up and running.</p> <p>5 Q Can you go ahead and log in?</p> <p>6 MR. SCHULTZ: Do you want him to hit the</p> <p>7 "Record"?</p> <p>8 BY MS. ALBERT:</p> <p>9 Q Oh, yes, hit the "Record" first.</p> <p>10 A There?</p> <p>11 Q Yes.</p> <p>12 A Okay.</p> <p>13 Q And then go ahead and log into the</p> <p>14 system.</p> <p>15 A So I connect with our demo environment</p> <p>16 with a user name and a password.</p> <p>17 Q Now, can you select Supply Center and --</p> <p>18 well, strike that. Do you have all of the roles</p> <p>19 available to you today, supplier role, buyer role,</p> <p>20 content manager role?</p> <p>21 A Yes.</p> <p>22 Q Can you log in as a supplier to the</p>
<p>256</p> <p>1 today is Lee Bursten of Merrill LAD. And the</p> <p>2 witness is already sworn in.</p> <p>3 HENRIK BILLGREN</p> <p>4 having been previously duly sworn, testified as</p> <p>5 follows:</p> <p>6 FURTHER EXAMINATION BY COUNSEL FOR PLAINTIFF</p> <p>7 BY MS. ALBERT:</p> <p>8 Q I remind you, Mr. Billgren, that you</p> <p>9 remain under oath from yesterday. Do you</p> <p>10 understand?</p> <p>11 A I understand.</p> <p>12 Q Okay. Today we wanted to have a</p> <p>13 demonstration of the M3 e-Procurement system. And</p> <p>14 can you explain for me the system that we're about</p> <p>15 to see and how you've configured it for today's</p> <p>16 demonstration?</p> <p>17 A We are about to enter what we call our</p> <p>18 demo environment, which is an environment that we</p> <p>19 use to demonstrate the general functionality of the</p> <p>20 system, predominantly from a user's perspective.</p> <p>21 Q And have you made any special</p> <p>22 configuration adjustments to the demonstration</p>	<p>258</p> <p>1 Supply Center? So you're clicking on the Supply</p> <p>2 Center link on the home page there. And what is</p> <p>3 this screen?</p> <p>4 A This then, I'm now selected that I want</p> <p>5 to log on to the Supply Center. Then I have to</p> <p>6 check on which role I'm going to log in as. And --</p> <p>7 Q Can you log in for the role appropriate</p> <p>8 to an individual who would be uploading a supplier</p> <p>9 catalog as an Excel spreadsheet?</p> <p>10 A Yes. I will log on as a supplier here.</p> <p>11 Q And now you're presented with a page</p> <p>12 that's entitled "Supply Center Home." What are all</p> <p>13 the activities that a supplier can perform by</p> <p>14 accessing this Supply Center home page?</p> <p>15 A First, he sees the ongoing orders. Is it</p> <p>16 okay if I refer to the conversation yesterday, or</p> <p>17 not? Possibly not. These are the orders that's</p> <p>18 been posted for me as a supplier that I should</p> <p>19 ship, and whatever ongoing other things, activities</p> <p>20 I might have.</p> <p>21 Q Okay. And what would you do in order to</p> <p>22 upload your supplier catalog in an Excel format?</p>

<p>259</p> <p>1 A I'm not -- I don't have an Excel. This</p> <p>2 is the demo environment. I can't sort of have an</p> <p>3 Excel spreadsheet that I will upload. But I can</p> <p>4 display by clicking on catalogs how the supplier</p> <p>5 would view his catalogs or his uploaded product</p> <p>6 lists, which is what I just did.</p> <p>7 Q So the page we've been presented is the</p> <p>8 catalogs page. And I note that there's a tab,</p> <p>9 "View Catalogs," which appears to be the tab that</p> <p>10 we're at right now.</p> <p>11 A Yes.</p> <p>12 Q And what functionality can be done if you</p> <p>13 click on the -- if you enter something in the user</p> <p>14 interface labeled "Catalog Name"?</p> <p>15 A You want me to enter something there?</p> <p>16 Q Well --</p> <p>17 A It's a filter of -- it's a filter of what</p> <p>18 you see in your list view.</p> <p>19 Q So if you wanted to look for a particular</p> <p>20 catalog name, you could enter that catalog name</p> <p>21 into that user interface and just search for that</p> <p>22 specific catalog, is that correct?</p>	<p>261</p> <p>1 ready for update to be used if I were to add a new</p> <p>2 product, for instance.</p> <p>3 Q And if you clicked on the tab labeled</p> <p>4 "Catalog Files," what functions can be performed?</p> <p>5 A There I would see generated files and</p> <p>6 uploaded files that I might have in preparations of</p> <p>7 my product list slash catalog.</p> <p>8 Q Can you go back to "Catalog Details,"</p> <p>9 please.</p> <p>10 A Of the product.</p> <p>11 Q So down below, with "Results," are those</p> <p>12 the various different items that are in the catalog</p> <p>13 that are available to be published to the Meta</p> <p>14 Catalogue in the Buy Center?</p> <p>15 A Yes. These are the products that the</p> <p>16 buyer can view and create a requisition for.</p> <p>17 Q And can you click on one of those items?</p> <p>18 A Yes.</p> <p>19 Q So that's the item detail for that</p> <p>20 particular item, and it includes the various</p> <p>21 attributes or fields of data associated with that</p> <p>22 item; is that correct?</p>
<p>260</p> <p>1 A Filter for it.</p> <p>2 Q And what functionality is available if</p> <p>3 you use the status user interface there?</p> <p>4 A It's the same.</p> <p>5 Q All right. Can you display for us one of</p> <p>6 the catalogs?</p> <p>7 A Display a catalog?</p> <p>8 Q Yes.</p> <p>9 A So this supplier, I think this is the</p> <p>10 name, Ideal whatever, Hardware, he has these</p> <p>11 catalogs. And I click on one. And come the header</p> <p>12 of what is mentioned here as the catalog of this</p> <p>13 list of products. It's just information of the</p> <p>14 header. And inside this catalog you have various</p> <p>15 products that are either approved products, which</p> <p>16 are -- if I may, if I click there, these are the</p> <p>17 products that is used by the buyer, can be used by</p> <p>18 the buyer to do a requisition.</p> <p>19 Q And then if you click on the tab "Catalog</p> <p>20 Products," what's displayed there?</p> <p>21 A It's products that I'm planning to bring</p> <p>22 into this very catalog, products that could be</p>	<p>262</p> <p>1 A Yes.</p> <p>2 Q So what would be the process that would</p> <p>3 be used by the supplier in order to upload a</p> <p>4 supplier catalog as an Excel spreadsheet into the</p> <p>5 system?</p> <p>6 A He would upload the spreadsheet in as a</p> <p>7 catalog file, and then he would approve; maybe</p> <p>8 amend some of these details that you see here,</p> <p>9 price or delivery time, then approve. And when he</p> <p>10 has approved them, they will be part of this</p> <p>11 approved product details and can be used by the</p> <p>12 buyer in a requisition.</p> <p>13 Q Can you log out as the supplier and log</p> <p>14 in as a purchase manager or a content manager?</p> <p>15 A Still in the Supply Center. Where do you</p> <p>16 want me to be? Maybe I'll go in the beginning.</p> <p>17 Q I want to show the interface for the</p> <p>18 suppliers and the agreements and the catalogs that</p> <p>19 would be available to the content manager or the</p> <p>20 purchase manager, and then show an uploaded</p> <p>21 supplier catalog. I want to know the process that</p> <p>22 would be used to -- after the supplier has approved</p>

<p>263</p> <p>1 the catalog items, to publish those items into the</p> <p>2 Meta Catalog available in the Buy Center.</p> <p>3 A By just approving the uploaded list of</p> <p>4 products, that catalog, then they are published,</p> <p>5 they are now. So if I now log on as a requester, I</p> <p>6 will be able to view these products.</p> <p>7 Q Okay. Can you log in as a requester?</p> <p>8 A Yes.</p> <p>9 Q Or buyer.</p> <p>10 A Yes. I'll log in as a buyer.</p> <p>11 Q Now, what screen is presented here?</p> <p>12 A I am now displayed on this side the</p> <p>13 products that I am allowed to do a REQ on. And</p> <p>14 they are organized in product group structure.</p> <p>15 Q And to the right of that?</p> <p>16 A To the right of that I will have a list</p> <p>17 of my most recent requisitions. And you can</p> <p>18 actually have drafts or templates ongoing of</p> <p>19 requisitions.</p> <p>20 Q Okay. Can you go ahead and expand the</p> <p>21 fields, expand the catalog product hierarchies</p> <p>22 there?</p>	<p>265</p> <p>1 information -- the product database for the</p> <p>2 products that's been uploaded and approved by the</p> <p>3 suppliers, and it displays, with this filter on,</p> <p>4 everything that contains "hammer" in the product</p> <p>5 group.</p> <p>6 Q And what if you used the Product</p> <p>7 Information user interface, how does the search</p> <p>8 engine use that filter?</p> <p>9 A If I used what?</p> <p>10 Q The Product Information user interface.</p> <p>11 A Yes.</p> <p>12 Q How does the search engine make use of</p> <p>13 that filter?</p> <p>14 A In the very same manner. It will filter,</p> <p>15 it will locate. So yes, in very same manner, it</p> <p>16 will locate anything that contains "hammer" in the</p> <p>17 field "Product Information."</p> <p>18 Q And would the search, if you input a</p> <p>19 search query in the supplier input box, would the</p> <p>20 search engine search the database under the</p> <p>21 supplier attribute for items that have supplier</p> <p>22 names matching that input query?</p>
<p>264</p> <p>1 A So we have hand tools consist of hammers,</p> <p>2 hammers consist of steel hammers and titanium</p> <p>3 hammers, and steel hammers shows me the actual</p> <p>4 product in the list.</p> <p>5 Q Now, on the top of that, there are some</p> <p>6 filters shown there, product information, supplier,</p> <p>7 and product group. If I go back before you -- go</p> <p>8 back to the search interface without having any</p> <p>9 results displayed. Can you click on "Search"?</p> <p>10 A On "Search"?</p> <p>11 Q Yes. Did you click on -- okay. Can you</p> <p>12 explain how to use the filters that are shown</p> <p>13 there? "Product Information," if the user used</p> <p>14 that user interface to input a term there, what</p> <p>15 would happen?</p> <p>16 A You enter something, and then you click</p> <p>17 "Search."</p> <p>18 Q Does the search engine submit that input</p> <p>19 query to the catalog database and search for items</p> <p>20 that match that search query?</p> <p>21 A Yes. It uses what you put in here, in</p> <p>22 the field, and it goes to the one product</p>	<p>266</p> <p>1 A Could you repeat the question?</p> <p>2 MS. ALBERT: Can you read that back,</p> <p>3 please?</p> <p>4 (Requested portion of record read.)</p> <p>5 THE WITNESS: Yes.</p> <p>6 BY MS. ALBERT:</p> <p>7 Q Can you clear those fields. Can you</p> <p>8 input, under the supplier filter, the term</p> <p>9 "Siemens"?</p> <p>10 A Like this?</p> <p>11 Q Yes. And hit "Search." Oh. You don't</p> <p>12 have the same data. Can we see the catalog</p> <p>13 products that are available, can you just show me</p> <p>14 all of the products that are loaded into the</p> <p>15 catalog?</p> <p>16 A How do you mean?</p> <p>17 Q Can you just display for me all of the</p> <p>18 catalog items that are loaded into the</p> <p>19 demonstration system?</p> <p>20 A This depends on how the data has been</p> <p>21 defined. If it's been defined at this particular</p> <p>22 supplier Siemens, that this user or buyer in this</p>

<p>267</p> <p>1 case should not buy items or is not allowed to buy</p> <p>2 from this, then that doesn't display.</p> <p>3 Q Have you enabled the supplier field for</p> <p>4 searching today?</p> <p>5 A I don't understand that question. It's</p> <p>6 always been enabled. This is a standard screen.</p> <p>7 It's always looked like this. Whatever I put in</p> <p>8 here, an "S," all suppliers that has an S in them</p> <p>9 pops up. It's a filter. It's not a logical</p> <p>10 thinking thing, selecting for Siemens. It's just a</p> <p>11 filter on -- so S-I, for instance, will then</p> <p>12 show -- and there is no one who has those letters.</p> <p>13 S-O, possibly, I don't know.</p> <p>14 I don't know the database in its full</p> <p>15 extent.</p> <p>16 Q Can you show me --</p> <p>17 A This obviously -- because S-O then</p> <p>18 detects a supplier here called Lawson France. The</p> <p>19 data here is not representative of any customer in</p> <p>20 any real life situation.</p> <p>21 Q Okay.</p> <p>22 A It is pure playful data with no relevance</p>	<p>269</p> <p>1 with any kind of product, live potential customer</p> <p>2 demonstrations.</p> <p>3 Q Can you show me just a display of all the</p> <p>4 items that you currently have in the database</p> <p>5 available to this buyer? Just to show me each</p> <p>6 screen of all items that have been loaded.</p> <p>7 A So first I clear, then I search. Then I</p> <p>8 should be displayed here --</p> <p>9 Q Can you scroll down, please?</p> <p>10 A Then unfortunately, maybe I shouldn't use</p> <p>11 that word, but you need to page to the next page.</p> <p>12 Q Yes. Can you do that? Okay, go a little</p> <p>13 slower so I can see, please.</p> <p>14 A Okay. Do you want me to start from the</p> <p>15 beginning again?</p> <p>16 Q That's --</p> <p>17 A I can do that.</p> <p>18 Q Can you scroll or click next?</p> <p>19 (Witness complies.)</p> <p>20 Q Can you click next, please?</p> <p>21 (Witness complies.)</p> <p>22 Q Can you click next, please?</p>
<p>268</p> <p>1 really, and cannot be used to describe anything of</p> <p>2 the functionality in the system, really.</p> <p>3 Q Well --</p> <p>4 A The content of the data.</p> <p>5 Q I mean, don't you use the demo system to</p> <p>6 show customers how your system works?</p> <p>7 A Yes.</p> <p>8 Q So you want to be able to show the</p> <p>9 functionality of the actual product by using the</p> <p>10 demo system, don't you?</p> <p>11 A Yes. But typically what we do in a</p> <p>12 customer demonstration is that you prepare with a</p> <p>13 customer his situation, what type of transaction he</p> <p>14 wants to do, and then you investigate to figure</p> <p>15 out -- and it might -- actually in real cases you</p> <p>16 might actually come up with real items, that they</p> <p>17 want -- indirect material that they want to</p> <p>18 procure, and to make the demonstration, the</p> <p>19 presentation more live and a better fit for their</p> <p>20 specific requirements, you do that.</p> <p>21 That's generic, and it has nothing to do</p> <p>22 with e-Procurement, but that's typically what we do</p>	<p>270</p> <p>1 (Witness complies.)</p> <p>2 Q Can you click next, please?</p> <p>3 (Witness complies.)</p> <p>4 Q Can you click next, please?</p> <p>5 (Witness complies.)</p> <p>6 A Yes.</p> <p>7 Q All right. Can we do a search for IBM in</p> <p>8 the supplier input box?</p> <p>9 A Yes, we can.</p> <p>10 Q And now you've submitted that search to</p> <p>11 the search engine. It's searched your Meta Catalog</p> <p>12 and returned a hit list of items that matched the</p> <p>13 input search query; is that correct?</p> <p>14 A Yes. We search what we call the</p> <p>15 product -- the list of all the products that this</p> <p>16 buyer can buy.</p> <p>17 Q If I want to narrow it down, the search,</p> <p>18 can you input into the product information input</p> <p>19 box the term "laptops"?</p> <p>20 A Box the term "laptops" -- how do you</p> <p>21 mean.</p> <p>22 Q In the user interface for Product</p>

<p>271</p> <p>1 Information, can you input "laptops"?</p> <p>2 A With an "S"?</p> <p>3 Q I don't know if it matters.</p> <p>4 A It does.</p> <p>5 Q Oh, okay.</p> <p>6 A Because laptop is laptop. Laptops are</p> <p>7 laptops.</p> <p>8 Q Okay. Can you select the third matching</p> <p>9 item in the hit list there, the third one down?</p> <p>10 And let's show the item detail page. And now this</p> <p>11 is the detail page for this catalog item, and</p> <p>12 showing the various fields of data associated with</p> <p>13 this item in the catalog database; is that correct?</p> <p>14 A These are the datas that has been</p> <p>15 provided by the supplier and uploaded by the</p> <p>16 supplier, in this case IBM, and approved to be</p> <p>17 shown so that the buyer requester can ultimately</p> <p>18 order it or request it.</p> <p>19 Q So we have a picture of the item,</p> <p>20 correct?</p> <p>21 A Yes.</p> <p>22 Q And we have the product name associated</p>	<p>273</p> <p>1 "Details" URL there?</p> <p>2 A Like in all Microsoft windows, you will</p> <p>3 be able to get to a web page.</p> <p>4 Q Can we click that?</p> <p>5 A Open up another window.</p> <p>6 Q What would you expect to see there?</p> <p>7 A I would have expected that the supplier</p> <p>8 might have instead of written an entire -- how you</p> <p>9 say that in English -- an entire book as a</p> <p>10 description, that he indicated to a URL page where</p> <p>11 the buyer, the requisitioner in this case, if</p> <p>12 that's the English word for it, can go in and read</p> <p>13 for himself the information about this particular</p> <p>14 product.</p> <p>15 Q And do you know if sometimes, when you</p> <p>16 link out to that external URL, the supplier has</p> <p>17 some availability information located there?</p> <p>18 A I wouldn't know that.</p> <p>19 Q Can you go back to our item detail page?</p> <p>20 Can you keep scrolling down there? Or that's the</p> <p>21 end there.</p> <p>22 A I'm at the bottom.</p>
<p>272</p> <p>1 with the item; is that correct?</p> <p>2 A Yes.</p> <p>3 Q We also have in the item detail page the</p> <p>4 product group hierarchy that's associated with this</p> <p>5 particular item; is that correct?</p> <p>6 A Yes, that's correct.</p> <p>7 Q And then a description of the item, the</p> <p>8 price, the supplier name, correct?</p> <p>9 A Yes.</p> <p>10 Q And now the delivery time field, it says</p> <p>11 "Three days" there. What does that mean?</p> <p>12 A The intention with the information is</p> <p>13 that the supplier indicates how long it will take</p> <p>14 from -- I assume from when he is informed about</p> <p>15 that you want to have this specific item, this</p> <p>16 T61p.</p> <p>17 Q So it gives you some information that the</p> <p>18 supplier has this item available in stock because</p> <p>19 he's able to ship it to you in three days?</p> <p>20 A No. It doesn't give me any indication of</p> <p>21 what he has or not has in stock.</p> <p>22 Q What happens if you click on the</p>	<p>274</p> <p>1 Q Can you add that to the shopping cart,</p> <p>2 because we want to requisition that item.</p> <p>3 A I clicked on "Order."</p> <p>4 Q This order item page, what is this page</p> <p>5 used for?</p> <p>6 A This is the information that is copied</p> <p>7 from the product information in the product</p> <p>8 database list from the supplier. And now I'm</p> <p>9 determining really how much, what quantity, how</p> <p>10 many. I can also enter some account information.</p> <p>11 And I can sort of request a delivery date.</p> <p>12 Q And is this information going to be used</p> <p>13 to build a requisition by the system?</p> <p>14 A Yes.</p> <p>15 Q Can you go ahead and input that we want</p> <p>16 to order 100 of these?</p> <p>17 A A hundred.</p> <p>18 Q And what happens if you click "Continue"?</p> <p>19 Now, what screen is displayed here, labeled</p> <p>20 "Account Demand," what is this used for?</p> <p>21 A This is meant that in this requisition,</p> <p>22 the requisitioner can add additional information on</p>

<p>275</p> <p>1 whom ultimately should pay for these hundred</p> <p>2 laptops in this case, if there is a project in his</p> <p>3 organization ongoing. So it's just more detailed</p> <p>4 accounting information.</p> <p>5 Q Is this also going to be used by the</p> <p>6 system to build a requisition?</p> <p>7 A It is information that is connected to</p> <p>8 the requisition, yes, and other accounting details.</p> <p>9 Q Can we add the item to the shopping cart?</p> <p>10 A Yes, we can.</p> <p>11 Q Now, the screen that's displayed here</p> <p>12 labeled "Shopping Cart," what is this screen?</p> <p>13 A It displays the items that I now have in</p> <p>14 my shopping cart. So this is a self-service</p> <p>15 functionality, meaning that the buyer or the</p> <p>16 requisitioner should go in here, create his or her</p> <p>17 shopping cart, and when they are done, they create</p> <p>18 a requisition out of what they wanted to buy today.</p> <p>19 They might come back tomorrow or another day.</p> <p>20 Q Can we go back and continue searching for</p> <p>21 additional items to add to the shopping cart?</p> <p>22 A Yes.</p>	<p>277</p> <p>1 A I would expect -- what we do is that we</p> <p>2 filter on laptops, the product group laptops, as</p> <p>3 you see. So I would expect to see all other</p> <p>4 laptops that I'm allowed to requisition or purchase</p> <p>5 or buy. So if I should sort of want to buy another</p> <p>6 one or...</p> <p>7 Q Right. So if you had had --</p> <p>8 A Or similar.</p> <p>9 Q -- other laptops in addition to those</p> <p>10 supplied by IBM, that product catalog hierarchy</p> <p>11 would have returned in addition to the IBM laptops</p> <p>12 other laptops available from other suppliers; is</p> <p>13 that correct?</p> <p>14 A If I would have had other products listed</p> <p>15 here that's been sort of coded or uploaded or ended</p> <p>16 by another supplier in the same product group, that</p> <p>17 would have been displayed, yes.</p> <p>18 Q Thank you. Can we go back to our</p> <p>19 shopping cart that we're building. And now we have</p> <p>20 two line items, each associated with a different</p> <p>21 supplier; is that correct?</p> <p>22 A Yes.</p>
<p>276</p> <p>1 Q Let's go back and use the catalog</p> <p>2 hierarchy to search for items. Can we expand the</p> <p>3 hierarchy tree?</p> <p>4 A Yes. Hand tools.</p> <p>5 Q I just want to --</p> <p>6 A Hammers.</p> <p>7 Q I can't remember what the items were.</p> <p>8 A I've expanded now into something.</p> <p>9 Q Yes, let's click on steel hammers. And</p> <p>10 it doesn't really matter, let's select one of these</p> <p>11 and display the item detail page. Let's go ahead</p> <p>12 and click "Order." Let's buy ten of these or</p> <p>13 requisition ten of these. Click "Continue."</p> <p>14 A Yes.</p> <p>15 Q And then add that to the shopping cart.</p> <p>16 Now, if you go back and click on the ThinkPad T61p,</p> <p>17 the product name there, and go back to the item</p> <p>18 detail page. If I click on the product group --</p> <p>19 can you click on the product group?</p> <p>20 A Which one?</p> <p>21 Q The laptops. What would you expect to be</p> <p>22 returned as results?</p>	<p>278</p> <p>1 Q And can we take the next step and click</p> <p>2 "Create Requisition"? And what will happen when</p> <p>3 you click that?</p> <p>4 A I will just be presented with how the</p> <p>5 requisition will look before I finally, as a buyer,</p> <p>6 sort of agree with myself to send it off. I could</p> <p>7 enter a comment or whatever. And then I send it</p> <p>8 off for approval.</p> <p>9 Q So now the system took the information</p> <p>10 from the shopping cart, and the other information</p> <p>11 that you had filled out with the various screens,</p> <p>12 and built this requisition; is that correct?</p> <p>13 A Yes. The information that I had in what</p> <p>14 you saw as the shopping cart is now about to be</p> <p>15 formalized to become a requisition in the</p> <p>16 requisition database, so that the next step in the</p> <p>17 approval process, the approver can approve this</p> <p>18 requisition.</p> <p>19 Q Okay. Can we send this for approval?</p> <p>20 A Yes.</p> <p>21 Q And now the screen that's been generated</p> <p>22 is entitled "Requisition Details." What is the</p>

<p>279</p> <p>1 function of this screen?</p> <p>2 A It's just a confirmation screen that what</p> <p>3 you just had on the other screen is now a</p> <p>4 requisition.</p> <p>5 Q Okay. And can we view the authorization</p> <p>6 process? What screen is presented here?</p> <p>7 A It's just the status, it says that it's</p> <p>8 pending, and an authorizer needs to come in and</p> <p>9 authorize it.</p> <p>10 Q So can we log out as the buyer and log</p> <p>11 back in as the authorizer?</p> <p>12 A Yes, we can.</p> <p>13 Q What screen is shown there?</p> <p>14 A This has nothing to do with</p> <p>15 e-Procurement. This is something else. Do you</p> <p>16 want Autocomplete on?</p> <p>17 MR. SCHULTZ: It's an Internet Explorer.</p> <p>18 Click "No" for this.</p> <p>19 BY MS. ALBERT:</p> <p>20 Q Click "No," I guess. So now you're going</p> <p>21 to click on the "Approve" button; is that correct?</p> <p>22 A Yes. I am. And I want to log on as an</p>	<p>281</p> <p>1 screen, again, and an ability for the authorizer to</p> <p>2 enter information to the buyer, saying whatever.</p> <p>3 Q Okay. Can we go ahead and approve that</p> <p>4 requisition? Now, what will happen once the</p> <p>5 requisition is approved? What will the system do?</p> <p>6 A Now an order is created, and --</p> <p>7 Q We have two separate order numbers listed</p> <p>8 there.</p> <p>9 A Yes, we have.</p> <p>10 Q One for the ThinkPad that's going to IBM,</p> <p>11 and a second order for the steel hammer that's</p> <p>12 going to the machinery and equipment supplier; is</p> <p>13 that correct?</p> <p>14 A That is correct.</p> <p>15 Q So can we log out and log back in as the</p> <p>16 supplier in order to view the order? Or one of the</p> <p>17 orders. Would you log out and then log into the</p> <p>18 Supply Center to view --</p> <p>19 A I cannot guarantee that we will hit these</p> <p>20 orders, because I -- I'm logging on with a preset</p> <p>21 supplier.</p> <p>22 Q Now, where would an item that was just</p>
<p>280</p> <p>1 authorizer.</p> <p>2 Q And what screen is presented to the</p> <p>3 authorizer here, entitled "Requisitions"?</p> <p>4 A Up will come the requisitions that is</p> <p>5 pending him or hers approval. In this demo</p> <p>6 environment with these profiles, they connect</p> <p>7 together, so that what we require is then -- it</p> <p>8 could have been different individuals, but it's now</p> <p>9 connected so that this approver will see what we</p> <p>10 just required.</p> <p>11 Q And I see two requisitions that are</p> <p>12 pending there. Is the first requisition with the</p> <p>13 ThinkPad and the hammer, that's the one that we</p> <p>14 just built; isn't that correct?</p> <p>15 A It is the one we just built, yes.</p> <p>16 Q So how would the authorizer go about</p> <p>17 approving that requisition?</p> <p>18 A He would either -- he can view it. And</p> <p>19 he can also view individual details of each of the</p> <p>20 lines. And then he just clicks "Approve."</p> <p>21 Q Go ahead and approve it.</p> <p>22 A He's presented with a confirmation</p>	<p>282</p> <p>1 posted be found? Under the status section of the</p> <p>2 Supply Center home?</p> <p>3 A Yes.</p> <p>4 Q And if the supplier wanted to go in and</p> <p>5 view an order and say, I'm not able to fulfill</p> <p>6 those at this time, the product is on backorder,</p> <p>7 what would the supplier do?</p> <p>8 A He would just have to comment on what he</p> <p>9 can do or not. I don't actually have --</p> <p>10 Q Well, can you --</p> <p>11 A -- that flow.</p> <p>12 Q That looks like one we just did, I think.</p> <p>13 So you had put in the "Delivery Comment" field --</p> <p>14 A Yes.</p> <p>15 Q -- some information saying, I'm out of</p> <p>16 stock, it's on backorder; is that correct?</p> <p>17 A Yes.</p> <p>18 Q I think that's the end of what I would</p> <p>19 like to see demonstrated. Can you hit -- I think</p> <p>20 you can hit F9 to stop the recording. Hit F9.</p> <p>21 A F9.</p> <p>22 Q Or I think you can hit down there too,</p>

<p>283</p> <p>1 with the Cantasia. And hit "Stop." Thank you.</p> <p>2 A Thank you.</p> <p>3 MS. ALBERT: Can we take a short recess?</p> <p>4 MR. SCHULTZ: Yes.</p> <p>5 THE VIDEOGRAPHER: We're going off the</p> <p>6 record. The time is 9:26 a.m.</p> <p>7 (Recess.)</p> <p>8 THE VIDEOGRAPHER: We're now back on the</p> <p>9 record. The time is 9:34 a.m.</p> <p>10 BY MS. ALBERT:</p> <p>11 Q Mr. Billgren, there were a couple of</p> <p>12 items yesterday that you just indicated you needed</p> <p>13 to refresh your recollection on. I wanted to see</p> <p>14 if you were able to remember anything overnight.</p> <p>15 Do you have any recollection of what the base</p> <p>16 license fee is associated with the e-Procurement</p> <p>17 application?</p> <p>18 A In an amount in dollars, you mean?</p> <p>19 Q Yes.</p> <p>20 A No, I did not recollect the details of</p> <p>21 that.</p> <p>22 Q Do you have any recollection of the</p>	<p>285</p> <p>1 indicated in the documentation that those templates</p> <p>2 existed and could be used when you were sort of</p> <p>3 doing what you just said. But they are part of the</p> <p>4 training materials. Exactly where they are</p> <p>5 physically located, I don't know. They are</p> <p>6 probably somewhere in the implementation package of</p> <p>7 our solution.</p> <p>8 MS. ALBERT: Counsel, can you provide us</p> <p>9 a copy of those templates?</p> <p>10 MR. SCHULTZ: We will look into that,</p> <p>11 yes.</p> <p>12 BY MS. ALBERT:</p> <p>13 Q Have you ever seen a copy of any of the</p> <p>14 ePlus patents that are in suit here?</p> <p>15 A I have viewed one of those patents.</p> <p>16 Q Do you recall which patent you have</p> <p>17 viewed?</p> <p>18 A Not -- not by numbers. I think it was...</p> <p>19 Q Pardon me?</p> <p>20 A No, not by numbers.</p> <p>21 MS. ALBERT: Let me go ahead and mark as</p> <p>22 Billgren Exhibit 21 a copy of United States Patent</p>
<p>284</p> <p>1 number of total customers of the e-Procurement</p> <p>2 application?</p> <p>3 A We have to the best of my knowledge just</p> <p>4 shy of or below 30 customers.</p> <p>5 Q And are any of those -- do any of those</p> <p>6 customers have users in the United States?</p> <p>7 A Yes. One, to my knowledge.</p> <p>8 Q And were you able to recollect the name,</p> <p>9 the new name of the Colony Liquor company?</p> <p>10 A I was.</p> <p>11 Q And what's that name?</p> <p>12 A It is Empire Merchant North.</p> <p>13 Q Were you able to recollect where the file</p> <p>14 formats for the catalog import might be located?</p> <p>15 You indicated yesterday that Lawson provides</p> <p>16 standard templates for the Excel spreadsheet or the</p> <p>17 XML format used by a supplier to upload their</p> <p>18 supplier catalog into the Supply Center. And</p> <p>19 yesterday you couldn't recollect where those file</p> <p>20 formats are located. Have you been able to</p> <p>21 recollect overnight?</p> <p>22 A To my recollection yesterday, it was</p>	<p>286</p> <p>1 Number 6,023,683.</p> <p>2 (Billgren Exhibit 21 was marked for</p> <p>3 identification and attached to the deposition</p> <p>4 transcript.)</p> <p>5 BY MS. ALBERT:</p> <p>6 Q Mr. Billgren, do you recall if the patent</p> <p>7 that's been marked as Exhibit 21, which I'll refer</p> <p>8 to as the '683 patent, is that the patent that you</p> <p>9 have reviewed?</p> <p>10 A To the best of my understanding, yes.</p> <p>11 Q When did you review this patent?</p> <p>12 A Within the last weeks.</p> <p>13 Q So had you ever seen this patent before</p> <p>14 the lawsuit was filed?</p> <p>15 A No.</p> <p>16 Q What was the nature of your review of</p> <p>17 this patent?</p> <p>18 A Define "nature."</p> <p>19 Q What did your review process consist of?</p> <p>20 A Review process?</p> <p>21 Q You said you had reviewed the patent.</p> <p>22 What was --</p>

<p>287</p> <p>1 A Yes, it was my -- probably my non-native</p> <p>2 English. I have gone over it on a high level to</p> <p>3 try to understand what from my perspective this was</p> <p>4 about. I wouldn't call it a review process.</p> <p>5 Q Can you turn to column 24 of the patent.</p> <p>6 You see there are column -- well, if you turn past</p> <p>7 the figures pages --</p> <p>8 A Okay.</p> <p>9 Q -- at the start of the text, there are</p> <p>10 columns at the top, column numbers.</p> <p>11 A Yes.</p> <p>12 Q Can you turn to column 24? And starting</p> <p>13 at the bottom of column 24 through the end of the</p> <p>14 patent, that's the section we refer to as the</p> <p>15 claims.</p> <p>16 A Yes.</p> <p>17 Q Did you undertake a review of the claims</p> <p>18 of the '683 patent?</p> <p>19 A I -- again, maybe not "review" is the</p> <p>20 right word, but I read them on a high level.</p> <p>21 Q Did you review either of the other two</p> <p>22 patents that are involved in the suit?</p>	<p>289</p> <p>1 A Yes. To my knowledge there's only one</p> <p>2 customer using e-Procurement in the United States.</p> <p>3 Q And you're talking about e-Procurement</p> <p>4 when you're talking about those customers, correct?</p> <p>5 A Yes. I'm only referring to e-Procurement</p> <p>6 when we said just below 30 customers, yes.</p> <p>7 Q Of the 30 customers that are worldwide</p> <p>8 using the e-Procurement system, do any of those 30</p> <p>9 customers -- what's the number of the 30 customers</p> <p>10 that actually would use it in the United States?</p> <p>11 A The one customer that I mentioned</p> <p>12 earlier.</p> <p>13 Q So other than that one, the other 30 do</p> <p>14 not use it in the United States, is that your</p> <p>15 understanding?</p> <p>16 A That's my understanding, yes.</p> <p>17 MR. SCHULTZ: Nothing further at this</p> <p>18 time.</p> <p>19 MS. ALBERT: I have one recross question.</p> <p>20 FURTHER EXAMINATION BY COUNSEL FOR PLAINTIFF</p> <p>21 BY MS. ALBERT:</p> <p>22 Q Are there any customers of M3 that also</p>
<p>288</p> <p>1 A No.</p> <p>2 MS. ALBERT: That concludes my initial</p> <p>3 examination. I reserve the right for recross</p> <p>4 pending counsel's redirect. I want to note that</p> <p>5 I'm not concluding the 30(b)(6) portion of the</p> <p>6 deposition, given that there are some topics for</p> <p>7 which Mr. Billgren was designated that he lacked</p> <p>8 complete knowledge.</p> <p>9 And additionally I'm leaving the 30(b)(6)</p> <p>10 portion open in view of the fact that we are still</p> <p>11 receiving document productions from Lawson, and</p> <p>12 there may be relevant documents included in those</p> <p>13 productions. So therefore I'm recessing the</p> <p>14 30(b)(6) portion of the deposition.</p> <p>15 EXAMINATION BY COUNSEL FOR DEFENDANT</p> <p>16 BY MR. SCHULTZ:</p> <p>17 Q Mr. Billgren, you just testified that</p> <p>18 there were just below 30 customers in total, and</p> <p>19 that's throughout the world, right?</p> <p>20 A Yes.</p> <p>21 Q And you also testified there was just one</p> <p>22 customer in the United States?</p>	<p>290</p> <p>1 have the e-Procurement application integrated with</p> <p>2 the M3 system?</p> <p>3 A Other -- I'm not sure I understood.</p> <p>4 Outside of -- yes, please continue.</p> <p>5 Q You testified about these just under 30</p> <p>6 customers that have the e-Procurement application.</p> <p>7 Do those customers -- are you counting them as only</p> <p>8 having the e-Procurement application and no other</p> <p>9 M3 application?</p> <p>10 A Whether each and every of them have M3</p> <p>11 integrated or another ERP integrated, I don't have</p> <p>12 that details on top of my head. But the 30 is the</p> <p>13 sole who has e-Procurement, either as a standalone,</p> <p>14 some of them are standalone, some of them are</p> <p>15 integrated with M3.</p> <p>16 Q So there would be no other M3 customers</p> <p>17 unaccounted for in that 30 number that might also</p> <p>18 have the e-Procurement application integrated with</p> <p>19 an M3 system?</p> <p>20 A That will be -- you have to -- my English</p> <p>21 stops me there.</p> <p>22 Q In addition to the 30 customers that</p>

<p style="text-align: right;">291</p> <p>1 you've mentioned, are there any other customers</p> <p>2 that have the M3 system that then also have the</p> <p>3 e-Procurement system as an add-on integrated to it?</p> <p>4 A Now I understand. No, not to my</p> <p>5 knowledge.</p> <p>6 MS. ALBERT: Okay. Thank you. And</p> <p>7 again, I'm leaving open the 30(b)(6) portion of the</p> <p>8 deposition.</p> <p>9 THE VIDEOGRAPHER: This marks the end of</p> <p>10 tape number 1 in the deposition of Mr. Billgren.</p> <p>11 We're going off the record. The time is 9:46 a.m.</p> <p>12 (Signature having not been waived, the</p> <p>13 deposition of HENRIK BILLGREN was adjourned at</p> <p>14 9:46 a.m.)</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>	<p style="text-align: right;">293</p> <p>1 CERTIFICATE OF SHORTHAND REPORTER-NOTARY PUBLIC</p> <p>2 I, Lee Bursten, the officer before whom</p> <p>3 the foregoing deposition was taken, do hereby</p> <p>4 certify that the foregoing transcript is a true and</p> <p>5 correct record of the testimony given; that said</p> <p>6 testimony was taken by me stenographically and</p> <p>7 thereafter reduced to typewriting under my</p> <p>8 direction; and that I am neither counsel for,</p> <p>9 related to, nor employed by any of the parties to</p> <p>10 this case and have no interest, financial or</p> <p>11 otherwise, in its outcome.</p> <p>12 IN WITNESS WHEREOF, I have hereunto set</p> <p>13 my hand and affixed my notarial seal this 26th day</p> <p>14 of October, 2009.</p> <p>15 My commission expires: June 30, 2014.</p> <p>16</p> <p>17</p> <p>18</p> <p>19 _____</p> <p>20 LEE BURSTEN</p> <p>21 NOTARY PUBLIC IN AND FOR</p> <p>22 THE DISTRICT OF COLUMBIA</p>
<p style="text-align: right;">292</p> <p>1 * * *</p> <p>2 ACKNOWLEDGEMENT OF DEPONENT</p> <p>3 I, HENRIK BILLGREN, do hereby acknowledge</p> <p>4 that I have read and examined the foregoing</p> <p>5 testimony, and the same is a true, correct and</p> <p>6 complete transcription of the testimony given by</p> <p>7 me, and any corrections appear on the attached</p> <p>8 Errata sheet signed by me.</p> <p>9</p> <p>10 _____</p> <p>11 (DATE) (SIGNATURE)</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>	<p style="text-align: right;">294</p> <p>1 E R R A T A S H E E T</p> <p>2 IN RE: ePLUS INC. v. LAWSON SOFTWARE, INC.</p> <p>3 RETURN BY: _____</p> <p>4 PAGE LINE CORRECTION AND REASON</p> <p>5 _____</p> <p>6 _____</p> <p>7 _____</p> <p>8 _____</p> <p>9 _____</p> <p>10 _____</p> <p>11 _____</p> <p>12 _____</p> <p>13 _____</p> <p>14 _____</p> <p>15 _____</p> <p>16 _____</p> <p>17 _____</p> <p>18 _____</p> <p>19 _____</p> <p>20 _____</p> <p>21 _____</p> <p>22 (DATE) (SIGNATURE)</p>

1	ERRATA SHEET CONTINUED			295
2	IN RE: ePLUS INC. v. LAWSON SOFTWARE, INC.			
3	RETURN BY: _____			
4	PAGE	LINE	CORRECTION AND REASON	
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22	(DATE)	(SIGNATURE)		

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of August, 2010, I will electronically file the foregoing

**PLAINTIFF ePLUS INC'S OBJECTIONS TO DEFENDANT'S COUNTER
DEPOSITION DESIGNATIONS, COUNTER-COUNTER DESIGNATIONS
AND REVISED SUMMARY OF THE DEPOSITION OF
HENRIK BILLGREN (OCT. 22, 2009)**

with the Clerk of Court using the CM/ECF system which will then send a notification of such filing (NEF) via email to the following:

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